

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

In Re:  Generations on 1 <sup>st</sup> LLC,  Debtor.	Case No.: 25-30002  Chapter 11
In Re:  Parkside Place LLC,  Debtor.	Case No. 25-30003  Chapter 11  (Jointly Administered)

**DECLARATION OF CAREN STANLEY**

Pursuant to 28 U.S.C. § 1746, I, Caren Stanley, do hereby declare, under penalty of perjury, the following to the best of my knowledge, information, and belief:

1. I am an attorney with the Vogel Law Firm and represent secured creditor Red River State Bank in these bankruptcy cases.
2. Attached as Exhibit 1 is a true and correct copies of a letter sent on July 7, 2025 to attorneys Dan Frisk and Mark Schwab who are counsel to the “Craig Entities” including Craig Holdings, LLC, Craig Properties, LLC, Craig Development, LLC, CP Business Management, Inc., Mulinda aka Mindy Craig and Jesse Craig.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated this 7<sup>th</sup> day of July, 2025.

BY:/s/ Caren W. Stanley  
Caren W. Stanley

4916-3205-4355 v.1

Phone: 701.237.6983  
218 NP Avenue | Fargo, ND 58102  
PO Box 1389 | Fargo, ND 58107-1389  
Fax: 701.476.7676  
cstanley@vogellaw.com

July 7, 2025

**VIA EMAIL ONLY**

Dan Frisk  
dan@stflawfirm.com

Mark Schwab  
mark@stflawfirm.com

**Re: Red River State Bank v. The Ruins LLC  
Red River State Bank v. Generations on 1st LLC  
Red River State Bank v. Parkside Place LLC  
Our File No.: 034534.25025  
034534.25026  
034534.25027**

Dear Mr. Frisk and Mr. Schwab:

As you are aware, Subpoenas in the three above-titled bankruptcy cases were served on the following entities back on April 8, 2025:

1. Craig Holdings, LLC;
2. Craig Properties, LLC;
3. Craig Development, LLC;
4. CP Business Management, Inc.;
5. Mulinda a/k/a Mindy Craig; and
6. Jesse Craig;

(hereinafter collectively the “Craig Entities”).

The deadline to respond to the subpoenas was Monday, April 21, 2025 at 3:00 p.m. No objection to the subpoenas has ever been received and Red River State Bank (“RRSB”) filed a Motion to Compel Discovery of Documents and for Contempt on May 12, 2025 (the “Motion”). No response to the Motion has been filed by the Craig Entities.

July 7, 2025  
Page 2

On May 15, 2025, one box of documents was dropped off at the Vogel Law Firm which was not date-stamped but contained 2481 pages. These are the *only* documents that have ever been provided by the Craig Entities (or by the three debtor entities) despite having been in litigation in the three South Dakota foreclosure lawsuits since early 2024. This is in sharp contrast with the documents produced by RRSB in the South Dakota litigation as follows:

1. Generations on 1<sup>st</sup>, LLC documents bates-numbered 00001-04385
2. Mulinda documents bates-numbered 00001-05691
3. Parkside Place, LLC bates-numbered 00001-02050
4. The Ruins, LLC bates-numbered 00001-02191

The extremely limited document production of the Craig Entities pursuant to the Subpoenas is woefully inadequate as more fully described below.

#### ***A. Ruins***

The Subpoenas requested the following documents with respect to the Ruins:

1. All written communications between You or anyone acting on Your behalf and any Affiliate from January 1, 2020 to present with respect to the Ruins Project, including but not limited to text messages and emails.
2. All written communications between You or anyone acting on Your behalf and Red River State Bank and its representatives with respect to draw requests for the Ruins Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
3. All written communications between You or anyone acting on Your behalf and Watertown Development Corporation or its authorized representatives, including but not limited to First Dakota Title, with respect to funds provided for the Ruins Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
4. All written communications between You or anyone acting on Your behalf and any subcontractors and/or material suppliers that provided services, labor, and/or materials with respect to the Ruins Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.

July 7, 2025  
Page 3

5. Documentation for the Ruins Project including but not limited to:
  - a. Quotes and/or contract(s) for services, labor, and/or materials to be provided;
  - b. Invoices, statements, and payment applications for services, labor, and/or materials provided;
  - c. Draw requests and records of payments received for services, labor, and/or materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.;
  - d. Records of payments made for services and materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.; and
  - e. Lien waivers.

The box of documents included a total of **180 pages** (from pages 01606-01794) that were bound together with a rubberband and had a post-it note that indicated “Ruins” on the front page. **Attachment 1** to this letter includes a recitation of what was contained in these 180 pages related to the Ruins Project. It is evident there are many documents that have not been provided and it is particularly troubling that virtually every single email fails to include the relevant attachments such as invoices, bids, etc.

According to RRSB’s knowledge, information and belief, there were fourteen (14) draw requests for the Ruins Project. No copies of the draw requests submitted by Craig Development, LLC and/or Jesse Craig to RRSB were provided. No quotes, invoices, statements, records of payment, lien waivers, etc. were provided either. Based on these fourteen (14) draw requests there were at a minimum sixty (60) subcontractors that were supposed to be paid out of the fourteen (14) draw requests – *see Attachment 1* for list of subcontractor names.

It appears that no emails or documents were provided in the “Ruins” documentation (pp. 01606-1794) with respect to thirty-seven (37) of the sixty (60) known subcontractors or interested parties paid through the fourteen (14) draw requests.

#### ***B. Generations Documents***

The Subpoenas requested the following documents with respect to the Generations Project:

6. All written communications between You or anyone acting on Your behalf and any Affiliate from January 1, 2020 to present with respect to the Generations Project, including but not limited to text messages and emails.

July 7, 2025  
Page 4

7. All written communications between You or anyone acting on Your behalf and Red River State Bank and its representatives with respect to draw requests for the Generations Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
8. All written communications between You or anyone acting on Your behalf and Watertown Development Corporation or its authorized representatives, including but not limited to First Dakota Title, with respect to funds provided for the Generations Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
9. All written communications between You or anyone acting on Your behalf and any subcontractors and/or material suppliers that provided services, labor, and/or materials with respect to the Generations Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
10. Documentation for the Generations Project including but not limited to:
  - a. Quotes and/or contract(s) for services, labor, and/or materials to be provided;
  - b. Invoices, statements, and payment applications for services, labor, and/or materials provided;
  - c. Draw requests and records of payments received for services, labor, and/or materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.;
  - d. Records of payments made for services and materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.; and
  - e. Lien waivers.

The box of documents included a total of **432 pages** (from pages 02051-02481) that were bound together with a rubberband and had a post-it note that indicated “Generations” on the front page. **Attachment 1** to this letter includes a recitation of what was contained in these 432 pages related to the Generations Project. It is evident there are many documents that have not been provided and it is particularly troubling that virtually every single email fails to include the relevant attachments such as invoices, bids, etc.

According to RRSB’s knowledge, information, and belief, there were seventeen (17) draw requests for the Generations Project. No copies of the draw requests submitted by Craig Development, LLC and/or Jesse Craig were provided. No quotes, invoices, statements, records of payment, lien waivers, etc. were provided either. Based on these seventeen (17) draw requests there were at a minimum

July 7, 2025  
Page 5

sixty-two (62) subcontractors that were supposed to be paid out of the seventeen (17) draw requests. *See Attachment 1* for list of subcontractor names.

It appears that no emails or documents were provided in the Generations documentation (pp. 02051-02481) with respect to thirty-four (34) of the sixty-two (62) known subcontractors or interested parties paid through the seventeen (17) draw requests.

### ***C. Parkside Documents***

The Subpoenas requested the following documents with respect to the Parkside Project:

11. All written communications between You or anyone acting on Your behalf and any Affiliate from January 1, 2020 to present with respect to the Parkside Project, including but not limited to text messages and emails.
12. All written communications between You or anyone acting on Your behalf and Red River State Bank and its representatives with respect to draw requests for the Parkside Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
13. All written communications between You or anyone acting on Your behalf and Watertown Development Corporation or its authorized representatives, including but not limited to First Dakota Title, with respect to funds provided for the Parkside Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
14. All written communications between You or anyone acting on Your behalf and any subcontractors and/or material suppliers that provided services, labor, and/or materials with respect to the Parkside Project from January 1, 2020 to the present, including but not limited to text messages and emails including all attachments to emails.
15. Documentation for the Parkside Project including but not limited to:
  - a. Quotes and/or contract(s) for services, labor, and/or materials to be provided;
  - b. Invoices, statements, and payment applications for services, labor, and/or materials provided;
  - c. Draw requests and records of payments received for services, labor, and/or materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.;
  - d. Records of payments made for services and materials provided including but not limited to bank statements, copies of checks (front and back), wire transfer records, etc.; and
  - e. Lien waivers.

July 7, 2025  
Page 6

The box of documents included a total of **257 pages** (from pages 01795-02050) that were bound together with a rubberband and had a post-it note that indicated “Parkside” on the front page. **Attachment 1** to this letter includes a recitation of what was contained in these 257 pages. It is evident there are many documents that have not been provided, and it is particularly troubling that virtually every single email fails to include the relevant attachments such as invoices, bids, etc.

According to RRSB’s knowledge, information, and belief, there were thirteen (13) draw requests for the Parkside Project. No copies of the draw requests submitted by Craig Development, LLC and/or Jesse Craig were provided. No quotes, invoices, statements, records of payment, lien waivers, etc. were provided either. Based on these thirteen (13) draw requests there were at a minimum fifty-two (52) subcontractors that were supposed to be paid out of the thirteen (13) draw requests. *See Attachment 1* for list of subcontractor names.

It appears that no emails or documents were provided in the Parkside documentation (pp. 01795-02050) with respect to twenty-five (25) of the fifty-two (52) known subcontractors or interested parties paid through the draw requests.

I would like to highlight one stark example of the problem caused by failing to include attachments to the emails. For example, numerous emails between Jesse Craig and RRSB employee Martin Peterson were provided consisting of 420 pages (00661-01081), however none of the emails included the attachments. These attachments are critical and must be produced. For example, an email from Jesse Craig to Martin Peterson dated October 18, 2020, stated as follows:

**From:** Jesse Craig [mailto:[jcraig@craigprop.com](mailto:jcraig@craigprop.com)]  
**Sent:** Sunday, October 18, 2020 8:11 AM  
**To:** Martin H. Peterson <[Martin.Peterson@redriverbank.com](mailto:Martin.Peterson@redriverbank.com)>  
**Cc:** Jesse Craig <[jcraig@craigprop.com](mailto:jcraig@craigprop.com)>  
**Subject:** Parkside Draws

Good Morning!

Attached are the draw 3 which I paid and would use this as part of my cash into the project. Draw 4 is what I would like to start using construction funds for. I am not sure how you are looking for maybe \$250,000 line of credit on the project to start getting these paid. Let me know your thoughts.

Thank you!

PS....I am so sick of the cold ALREADY 😊

July 7, 2025  
Page 7

However, the attachment regarding Draw #3 was not provided. The missing attachment is particularly important given that the Parkside responses to RRSB's requests for admission (which were recently provided on Friday, July 5, 2025) indicated as follows:

**Request 26.** Admit that Parkside, Jesse Craig and/or Craig Development, LLC had agreed and represented to Watertown Development Company and Plaintiff that Draw #3 was intended as a cash injection by the owner to the Parkside Project.

**Answer.** Denied. In further answer, neither Parkside, Jesse Craig, nor Craig Development, LLC represented to Watertown Development Company or Plaintiff that Draw #3 was intended as a cash injection by the owner into the Parkside Project.

**Request 27.** Admit that Craig Development, LLC, Parkside, and/or Jesse Craig provided a copy of Exhibit 3-A to RRSB and its representatives in support of future draw requests to be made by RRSB for the benefit of the Parkside Project.

**Answer.** Denied. In further answer, Craig Development, LLC, Parkside, and/or Jesse Craig did not provide Exhibit 3-A to RRSB or its representatives in support of any future draw requests for the Parkside Project.

It appears that Parkside's response to these requests for admission is clearly incorrect and/or possibly deliberately misleading. The missing attachment from this October 18, 2020 email is merely one example of information that has not been disclosed by the Craig Entities (and the three debtor entities) that should have been disclosed.

#### ***D. Lofts Project and Lake Home Project***

The Subpoenas also included similar requests for documentation with respect to the Lofts Project and the Lake Home Project.

With respect to the Lofts Project, a total of **90 pages** (from 01516-01604) were grouped together with a rubberband and had a "Lofts" post-it note on the first page. All of the emails provided with respect to the Lofts Project failed to include the attachments. Additionally, there were no draw requests, quotes, invoices, statements, records of payment, lien waivers, etc. provided.

With respect to the Lake Home Project, there were emails disclosed (primarily by Mindy Craig – total of **427 pages**; from 00001-00427) and another set of emails that were bound with a rubberband

July 7, 2025  
Page 8

and had a “Lake Home” post-it note on them that contained **234 pages** (from 00428-00660) mainly discussing requested changes to the Lake Home Project, colors, etc. but once again virtually no attachments were provided. Additionally, there were no quotes, invoices, statements, records of payment, lien waivers, etc. provided.

***E. Miscellaneous Documents***

Bank account information for Jesse Craig for a Wells Fargo account was provided for the period of December 31, 2020 to April 30, 2025 (pages 01126-01515) and also the quarterly statements for First Community Credit Union for Craig Holdings, LLC from March 2020 to March 2025. The bank statements did not include copies of any checks or deposits. No bank statements, checks, etc. were provided for Craig Development, LLC, Craig Properties, LLC, CP Business Management, or Mindy Craig.

It is evident that the Craig Entities did not take their obligations to respond to these Subpoenas seriously and have failed to comply with their obligations in good faith.

Regards,



Caren W. Stanley

cc: Client  
Mac VerStandig

**ATTACHMENT 1**

***A. Ruins Documents***

The box of documents included a total of **180 pages** (from pages 01606-01794) that were bound together with a rubberband and had a post-it note that indicated “Ruins” on the front page. The following documents were included in the “Ruins” documents provided:

- Email correspondence between Jesse Craig and his attorney Mike Gust about the City of Watertown’s complaints – attachments missing
- Email correspondence regarding conditional use permit and demo permit – attachments missing
- Email from Prevail Builders re: change orders – attachments missing
- Email from D&M Industries regarding bid – attachments missing
- Email from Carson Burghardt (Burghardt Construction) regarding drywall issue with photos
- Emails from SD State electrical inspector (and Dan Frisk letter to electrical inspector)
- Emails from City of Watertown Community Development Manager – attachment missing
- Emails from Civil Engineer from City of Watertown Public Works
- Email from Prevail Builders and D&M Industrial re: public restroom partitions – attachment missing
- Email from Prevail Builders and City of Watertown Civil Engineer re: Ruins schedule – attachment missing
- Email from Vast Broadband re: utilities – attachment missing
- Email from Infrastructure Design Group and Codington County Recorder’s Office re: alley – attachment missing
- Email from Jesse Craig to Charles Aarestad re: original appraisal – attachment missing
- Email from Prairie Environmental Consulting re: proposal for senior center abatement
- Email from Charles Aarestad to Jesse Craig re: copies of two loans – attachments missing

July 7, 2025  
Page 10

- Email from Jesse Craig to City of Watertown re: permit fee, reason for delay, extension request
- Lowe's email re: receipts – attachment(s) missing
- Email from Rusco Window – door style/stain – attachment missing
- Email from Prevail Builders re: carpet bids – attachment missing
- Email from Jesse Craig to City of Watertown complaint on dumpster – attachment missing
- Email between Infrastructure Design Group and Prevail Builders re: alley concrete pour
- Emails from Infrastructure Design Group re: plans
- Emails between Prevail Builders employees re: pictures of 5-days work
- Email from Brian's Glass & Door – attachment missing
- Email from City of Watertown inspection and deficiencies
- Email from City of Watertown attorney re: lease – attachment missing
- Email from Jesse Craig to Limoges Construction re: delay in payment
- Emails from Clausen Construction re: footings, structural fill, soil report – attachments missing
- Email from Schumacher Elevator re: final demand for payment – attachment missing
- Emails from TL Stroh re: plans, drawing sets, ADA showers – attachment missing
- Email from Prevail Builders re: electrician, Dugan's bills – attachments missing
- Email from Baete-Forseth re: pulling off job site for non-payment
- Emails from Hebron Brick re: order placed, siding bid – attachment missing
- Email from Codington County Recorder – attachment missing of recorded deed

July 7, 2025  
Page 11

- Emails from Watertown attorneys re: prior easement, title opinion
- Emails from Wysan Precast Services, Gage Bros, and Wolf Steel re: construction issues – attachments missing
- Email from Gage Bros. re: unpaid invoices – attachment missing
- Email from B&W Construction re: windows and siding
- Email from Skold Company re: trash chute materials invoice – attachment missing
- Email from Hamlin Builders re: unpaid invoice, statement– attachment missing

A review of the fourteen (14) draw requests for the Ruins identified sixty (60) subcontractors that performed work on the Ruins Project as follows:

Aason Engineering Co, Inc.  
B&W Construction  
Baete-Forseth HVAC LLC  
Boldt Construction  
Borns Construction  
Brian's Glass and Door  
Burghardt Construction/Carson Burghardt  
Cashway Lumber  
Casselton Lumber  
City of Watertown  
Clausen Construction  
D&M Industries  
Dakota Portable Toilets  
Diamond Wall Systems  
Don Johnson Construction  
Dugan Sales and Service, Inc.  
Duininck Concrete, LLC  
Freddy's Drywall  
Gage Brothers Concrete Products, Inc.  
George's Sanitation Inc.  
Geotek Engineering  
Hamlin Building Center  
Hebron Brick Company  
Infrastructure Design Group, Inc.  
Innovative Wall Design, Inc.

July 7, 2025  
Page 12

Justice Fire and Safety  
KLJ Engineering LLC  
Kloos Electric  
LaDue Construction Inc.  
Lakeside Construction  
Limoges Construction, Inc.  
Lowe's  
LS Customs and Snow  
Mackner Excavating Inc.  
Meyer Insurance  
Mutchler Bartram Architects  
North Star Logistics, LLC (dba Sentry Crane Services)  
Northern Technologies LLC (NTI)  
Prairie Environmental Consulting, LLC  
Prevail Build  
Rusco Window Company  
Sandman Structural Engineers  
Schumacher Elevator Company  
Sioux Valley Co-Op  
Site Fencing  
Skold Specialty Contracting LLC  
Stan Houston Equipment Company, Inc.  
Structural Materials (SM) Inc.  
Swanston Equipment Corporation  
TL Stroh Architects  
Top Finish Carpentry  
United Rentals  
US Assure  
Visto's Trailer Sales  
Walford Construction  
Watertight, Inc.  
Watertown Development Company  
Watertown Municipal Utilities  
Wolf Steel Construction  
Xtreme Fire Protection

It appears that no emails or documents were provided in the Ruins documentation (pp. 01606-01794) with respect to thirty-seven (37) of the sixty (60) known subcontractors or interested parties paid through the fourteen (14) draw requests.

July 7, 2025  
Page 13

***B. Generations Documents***

The box of documents included a total of **432 pages** (from pages 02051-02481) that were bound together with a rubberband and had a post-it note that indicated “Generations” on the front page. The following documents were included in the “Generations” documents provided:

- Email from Prevail Builders to Prairie Environmental Consulting re: asbestos reports to give to Clausen – missing attachments
- Email from Prevail Builders to CP Business Management re: guest suite, timing for completion – missing attachment
- Emails from Prevail Builders to Rusco Windows re: damaged cabinets, trash kit/vanity cabinets, refrigerator cabinet, drawing of kitchen cabinets, signed bid – missing attachments
- Email from Xtreme Fire re: city final above ground test certification – missing attachment
- Email from Prevail Builders to City of Watertown forestry department re: trees to be cut down
- Email from Prevail Builders re: bid from LL & Sons Excavating – missing attachment
- Emails from TL Stroh to Infrastructure Design Group re: building footprint – missing attachments
- Email from Prevail Builders re: Clausen bid to tear out old property
- Email from Infrastructure Design Group re: gas meter location
- Emails from Prevail Builders to TL Stroh, City of Watertown re: changes to transformer cabinets
- Email from Prevail Builders re: unmarked utility vault damaged by employee
- Email from Watertown Public Works re: grading permit, stockpiling of materials on lot
- Email from Infrastructure Design Group to City of Watertown Community Development re: foundation permit, encroachment to right of way – missing attachment

July 7, 2025  
Page 14

- Email from City of Watertown re: letter for certificate of occupancy – missing attachment
- Email from Boldt Concrete re: invoice – missing attachment
- Email from Prevail Builders re: Duininck quote for asphalt – missing attachment
- Email from Prevail Builders re: “bid I signed for your records” concerning curbs – missing attachment
- Email from Limoges Construction re: lien waiver – missing attachment
- Email from Limoges Construction re: other contractor Seppanen Contracting for few weeks to help out – missing attachments
- Email to Cale Setness re: need quote for foundation problem issue
- Email from Prevail Builders re: Limoges bids, waivers, overbilling for blankets – missing attachment
- Email from Prevail Builders to Rusco Windows re: ADA Counter heights
- Emails from Fabricator’s Unlimited re: revised drawings and change orders for countertops– missing attachment
- Email from Jesse Craig to City of Watertown re: council meeting agenda
- Email from Prevail Builders re: Tom Boldt’s invoices – missing attachments
- Email from City attorney for Watertown re: TIF#12 Development Agreement.pdf – missing attachment
- Email from D&M Industries re: doors – missing attachments
- Email from Prevail Builders re: Cashway Lumber door schedule and quote – missing attachments
- Email from Jesse Craig to himself re: Generations final drawing set.pdf – missing attachment
- Email from TL Stroh and Kloos Electric re: GFCI breakers

July 7, 2025  
Page 15

- Email from Kloos Electric – original estimate for Generations, Parkside commercial panels -missing attachments
- Emails from Schumacher Elevator re: O&M manual, submittal drawings and final drawing set – missing attachments
- Email from City of Watertown fire and rescue re: elevator
- Email from Clausen Construction re: invoice for senior living project – missing attachment
- Emails from Prevail Builders re: need more fill, GeoTek recommendation
- Emails from TL Stroh re: updated Exterior Material Choices, colors, balconies – missing attachments
- Email from Xtreme Fire re: credit for ceilings and clouds – missing attachment
- Email from Prevail Builders to TL Stroh re: fire sprinkler submittals – missing attachments
- Emails from Prevail Builders re: Duane's Floor Covering updated bid – missing attachment
- Email from City of Watertown Community Development – comments for foundation only permit request – missing attachments
- Emails from Sandman Structural Engineers re: 4th floor wall panel shops drawing, trash room chute change, truss shops – missing attachments
- Email from Prevail Builders re: parking lot striping bids– missing attachments
- Email from Prevail Builders re: Lake Area Door bid – missing attachment
- Email from Prevail Builders re: Brian's Glass & Door – missing attachment
- Email from Prevail Builders re: grading permit – missing attachment
- Email from Prevail Builders re: gypsum install by Don Johnson Construction – missing attachment

July 7, 2025  
Page 16

- Email from Mindy Craig re: Baete expenses due to improper install, Jason's Dryer Vent Cleaning comments – missing attachment (demand letter from attorney)
- Email from Prevail Builders to Baete Forseth re: leftover items to get retainage – missing attachments
- Email from Prevail Builders to Mechanical Sales SD, Inc. re: Louver color needed – missing attachment
- Email from MBN Engineering Inc. re: review of unit by Baete – missing attachments
- Email from Prevail Builders to TL Stroh re: revised Core Plank HVAC Hole layout – missing attachment
- Email from Prevail Builders re: Baete updated bid – missing attachment
- Email from Prevail re: Interstate Insulation foam – deduction for error – missing attachment
- Email from D&M Industries re: schedule – missing attachment
- Email from City attorney re: deeds, purchase agreement – missing attachments
- Email from Martin Peterson re: Generations term sheet, preapproval letter – missing attachments
- Email from Jesse Craig to Title Resource Network re: copy of note, mortgage – missing attachment
- Email from Lowe's re: updated pricing for kitchen faucets – missing attachment
- Email from Mindy Craig re: lock shop re: mailbox numbering
- Emails from Prevail Builders re: color of building with pictures from iPad, rooftop patio handrail bid picture – missing attachment
- Email from Cale Setness re: need full signed Document/Contract for Parkside, hadn't received contract for Generations
- Email from Prevail Builders re: full permit attached – missing attachment
- Email from Jesse Craig to Martin Peterson titled "quit claim" – missing attachments

July 7, 2025  
Page 17

- Email from Infrastructure Design Group re: foundation plan pdf – missing attachment
- Emails from City of Watertown engineering re: copy of recorded plat, receipt – missing attachments
- Email from Prevail Builders to TL Stroh re: flip bathroom and lose closet
- Email to Prevail Builders re: updated Watertight bid – missing attachment
- Email from MBN Engineering re: soaking tub and salon sink – missing attachment
- Email from Cashway Lumber re: CMU attachment, anchors – missing attachment
- Email from Fiegen Construction re: soil compaction tests and mortar ground breaks – missing attachments
- Email from LS Customs and Snow re: ramp railing bid – missing attachments
- Email from Pro-Tec Roofing re: invoice – missing attachment
- Email from Prevail Builders to TL Stroh re: moving roof drains – missing attachment
- Email from Cashway Lumber re: bid for closet shelving – missing attachment
- Email from Matson Exteriors re: bid for exterior cladding – missing attachment
- Email from Prevail Builders to Lowe's re: kitchen sinks
- Email from Aason Engineering Co, Inc. re: bid for GeoTek services – missing attachment
- Email from TL Stroh re: UL Designs for floor and roof – missing attachments
- Email from attorney Lisa Carrico re: water bill
- Email from Prevail Builders re: Cashway Lumber panel bid – missing attachment
- Email from Jesse Craig to attorney Lisa Carrico re: request that City of Watertown provide a bond for the TIFS vs. WDC – missing attachment
- Emails from Rusco Windows re: unpaid invoice, window color, proposal for windows – missing attachments

July 7, 2025  
Page 18

A review of the seventeen (17) draw requests for Generations identified sixty-two (62) subcontractors that performed work on the Generations Project as follows:

Aason Engineering Co, Inc.  
B&W Construction  
Baete-Forseth HVAC LLC  
Boldt Construction  
Brian's Glass and Door  
Burchatz Construction Co, Inc.  
Burghardt Construction/Carson Burghardt  
Cashway Lumber  
Circle C Construction LLC  
Clausen Construction  
Commercial Cleaning Services  
CR Concrete, Inc.  
Dakota Portable Toilets  
Diamond Vogel Paint  
Duane's Floor Covering LLC  
Duininck Concrete, LLC  
East River Homes  
Fabricators Unlimited  
Gage Brothers Concrete Products, Inc.  
Garrettson's Construction LC  
George's Sanitation Inc.  
Geotek Engineering  
Hebron Brick  
Infrastructure Design Group, Inc.  
Innovative Wall Design Inc.  
Interstate Insulation  
Justice Fire and Safety  
Kloos Electric  
LaDue Construction Inc.  
Lake Area Door  
Levijoki Drywall  
Limoges Construction, Inc. (LTI)  
LL and Sons Excavating  
Lockshop  
LS Customs and Snow  
Midcontinent Communications  
Mid States Distributors  
Northern Technologies (NTI)

July 7, 2025  
Page 19

P&M Steel Company  
Popham Construction LLC  
Prairie Environmental Consulting, LLC  
Prevail Build/Labor  
Pro Tec (ARS Roofing)  
Restaurant Design Equipment  
Rusco Window Company  
Schumacher Elevator Company  
Simplified Improvement Professionals (SIP)  
Sioux Valley Co-Op  
Skold Specialty Contracting LLC  
Sign Pro of Fargo  
Stan Houston Equipment Company, Inc.  
Structural Materials (SM) Inc.  
Swanston Equipment Corporation  
Swenson Welding  
T & J Parking Lot Maintenance  
TL Stroh Architects  
Tom Lohr  
US Assure  
Watertight Inc.  
Watertown Development Company  
Watertown Municipal Utilities  
Xtreme Fire Protection

It appears that no emails or documents were provided in the Generations documentation (pp. 02051-02481) with respect to thirty-four (34) of the sixty-two (62) known subcontractors or interested parties paid through the seventeen (17) draw requests.

#### ***C. Parkside Documents***

The box of documents included a total of **257 pages** (from pages 01795-02050) that were bound together with a rubberband and had a post-it note that indicated “Parkside” on the front page. The following documents were included in the “Parkside” documents provided:

- Emails from Dugan’s re: appliance bids and appliance invoices – missing attachments
- Email from Dugan’s, Prevail Builders re: appliances and placement
- Email from CBRE re: appraisal, current occupancy – missing attachment

July 7, 2025  
Page 20

- Email from Martin Peterson re: appraisal
- Email from Prairie Environmental Consultants re : abatement report – missing attachments
- Email from Prevail Builders to/from Jesse Craig re: draw request and deposit money with Prevail for canopy – missing attachment
- Email from Sandman Structural Engineers re: balcony materials
- Email between Jesse Craig and Martin Peterson re: REDI – missing attachment
- Emails from Prevail Builders re: blinds, scheduling software – missing attachment
- Emails from Prevail Builders to/from Rusco Window re: cabinets, shop drawing, ADA cabinets – missing attachment
- Emails from/to Attorney Greg Thompson and Jesse Craig to Watertown Development Corp re: TIF financing issues, additional charges
- Email from Prevail Builders re: Seppanen Contracting with comment “wait until we know if city is going to catch it” – missing invoice
- Email from Prevail Builders, Infrastructure Design Group, City of Watertown attorney re: Dunnick re: ADA compliant asphalt
- Emails from Infrastructure Design Group, Prevail Builders, City of Watertown engineering re: north alley and unmarked utility vault, easement for plat- missing attachments
- Email from Prevail Builders to Duininck re: quote/bid – missing attachment
- Email from Prevail Builders and Commercial Cleaning Services re: final cleaning bid – missing attachment
- Email from Title Resource Network re: need for lender's insurance
- Email from Prevail Builders to City of Watertown re: occupancy – missing attachments
- Emails from County Fair Foods re: pics of property, approval for signate – missing attachment

July 7, 2025  
Page 21

- Email from Prevail Builders re: Limoges budget bid – missing attachment
- Email from Prevail Builders to Fabricators Unlimited re: end cap replacements
- Email from Prevail Builders re: Clausen and “Ron”
- Email from Prevail Builders to Cashway Lumber re: Millwork Quotes, doorknobs, fire door – missing attachments
- Email from Prevail Builders re: George’s Sanitation
- Email from MBN Engineering, Inc., TL Stroh, Kloos Electric, Schumacher Elevator re: electrical addendum, elevators
- Email from/to Kloos Electric re: pay request form, downpayment, change list – missing attachment
- Email from Schumacher Elevator re: warranty ending – missing attachments
- Email from Xtreme Fire and Watertown Fire/rescue department re: hydraulic oil on sprinkler heads
- Email from TL Stroh re: exterior brick
- Email from Xtreme Fire re: core drill sketch, shop drawings, hydraulic calculations – missing attachments
- Email from Prevail Builders re: Duane’s Floor Coverings picture, hallway carpet, ADA planking
- Email from Prevail Builders re: budget/bill for floor epoxy – missing attachment
- Email from TL Stroh and Sandman Structural Engineers re: timeline on Generations
- Email from Prevail Builders re: Cashway Lumber over on draw request, credit for bad tape provided, invoice for trusses – missing attachments
- Email from Prevail Builders re: gypsum bid – missing attachment
- Emails from Prevail Builders re: Baete Forseth exhaust system, hoods and louvers for sidewall fans

July 7, 2025  
Page 22

- Email from Prevail Builders re: Interstate Insulation invoice
- Email from Lowe's re: toilets
- Email from Sign Pro re: sign proofs – missing attachment
- Emails from Cale Setness and Sandman Structural Engineers re: bricks, estimate, wall openings details – missing attachments
- Email from Home Depot re: mirrors, vanities – attachment missing
- Email from Diamond Vogel Paint – credit hold for nonpayment – missing attachments
- Email from Hebron Brick re: rooftop patio pedestals – missing attachment
- Email from Northern Technologies re: phase II report – missing attachment
- Email from Jesse Craig to City of Watertown, Infrastructure Design Group re: plat needs to be finalized, recorded
- Email from Boldt Construction re: cutting scuppers invoice – missing attachment
- Email from Prevail Builders to TL Stroh re: ADA bathroom – missing attachment
- Email from Prevail Builders, Lowe's, TL Stroh re: Watertight to purchase toilets – missing attachments
- Email to Gage Brothers Concrete re: check to be paid from Dakota Title, lien waivers
- Email from Prevail Builders re: Generations Stair Tower
- Email from Cashway Lumber re: account status and invoices – missing attachments
- Email from Sioux Valley Co-Op re: tank delivery info – missing attachments
- Email from SD Office of Economic Development re: REDI loan and request by Jesse Craig to withdraw from financing through REDI, equity injection by owner
- Email from Prevail Builders re: Pro-Tec roof cap colors
- Email from Prevail Builders re: schedule for work on Parkside – missing attachment

July 7, 2025  
Page 23

- Email from Prevail Builders re: sheetrock problems
- Email from Cashway Lumber re: closet material quote – missing attachment
- Email from Geotek Engineering & Testing Services re: excavation observation report, estimated costs – missing attachments
- Email from Jesse Craig to City of Watertown public works civil engineer re: storm sewer, review process
- Email from Prevail Builders to Rusco Windows re: left-hand side window attachments

A review of the thirteen (13) draw requests for Parkside identified fifty-two (52) subcontractors that performed work on the Parkside Project as follows:

American Fence  
B&W Construction  
Baete-Forseth HVAC LLC  
Brian's Glass and Door  
Boldt Construction  
Burghart Construction/Carson Burghardt  
Cashway Lumber  
Circle C Construction LLC  
Clausen Construction  
Codington County  
Construction Specialties, LLC  
CP Business Management  
Dakota Portable Toilets  
Diamond Vogel Paint  
Don Johnson Construction  
Dugan Sales and Service, Inc.  
Fabricators Unlimited  
Gage Brothers Concrete Products, Inc.  
George's Sanitation Inc.  
Geotek Engineering  
Hebron Brick  
Infrastructure Design Group, Inc.  
Innovative Wall Design, Inc. (Innovative Wall Systems)  
Interstate Insulation  
Journey Construction

July 7, 2025  
Page 24

Justice Fire and Safety  
Kloos Electric  
Lake Area Door  
Limoges Construction, Inc. (LCI)  
LL & Sons Excavating  
Lockshop  
Macksteel Warehouse  
Northern Technologies LLC (NTI)  
P&M Steel Company  
Popham Construction LLC  
Prairie Environmental Consulting, LLC  
RL Drywall  
Rusco Window Company  
Schumacher Elevator Company  
Seppanen Contracting Inc.  
Sign Pro of Fargo  
Simplified Improvement Professionals (SIP)  
Sioux Valley Co-Op  
Stan Houston Equipment Company, Inc.  
Summit Insurance Agency  
Swanston Equipment Corporation  
T & J Parking Lot Maintenance  
TL Stroh Architects  
Watertight, Inc.  
Watertown Development Company  
Watertown Municipal Utilities  
Xtreme Fire Protection

It appears that no emails or documents were provided in the Parkside documentation (pp. 01795-02050) with respect to twenty-five (25) of the fifty-two (52) known subcontractors or interested parties paid through the thirteen (13) draw requests.